

REMARKS/ARGUMENTS

Following amendment, Claims 1-62 remain in this application, including independent claims 1, 16, 31, 46, and 52.

The Office Action of March 4, 2005 rejected claims 1-62 under 35 USC §103(a) as being unpatentable over by U.S. Published Application No. 20010049634 (the “Stewart” reference) in view of U.S. Patent No. 5,903,873 (the “Peterson” reference). The rejection is respectfully traversed. As described in greater detail below, the present invention provides a unique network configure for allow individual consumers that are part of a larger networked entity to securely access personalized insurance information and to securely make personalized insurance selections.

Stewart, as described in its abstract, provides an on-line interactive network community for the integrated purchase and sale of metals, particularly steel. The community provides an on-line supply chain of steel from raw products producers through the eventual end user customer for steel products. Buyer members and seller members after they have been qualified to participate and are assigned their unique member identifications, and sale of products, such as steel coils, by means of the electronic system. Buyer members are given the option to purchase steel products from an on-line product catalog by either an auction mechanism or a fixed-price product guide.

Peterson discloses a system for registering insurance transactions and communicating the insurance transactions to a home office computer. Insurance agents use a portable computer to registering their transactions into a portable computer in the field and to communicate the insurance agent transactions to a home office computer which, in turn, processes the insurance agent transactions and transmits updated insurance information back to the portable computer.

To establish a *prima facie* case of obviousness, three criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must by some expectation of success. Third, the prior art references must disclose or suggest all of the claimed features. MPEP 2143. Applicants respectfully submit that these criteria have not been met with respect to the rejected claims as amended.

For example, Claim 1 of the present invention recites in part, “A method facilitated by a computer network to accomplish a trusted insurance transaction between an insurance business entity and a *plurality of individual networked insurance consumers* forming a network entity, comprising the acts of: providing an administrative server having a communications channel for electronically communicating with the insurance business entity and having a communications channel for electronically communicating with the networked entity and the networked insurance consumers....” The Office Action refers to paragraphs 0020 of Stewart as teaching the feature of communicating with both the networked entity and the networked insurance consumers. However, in the invention of Stewart discloses a buyer that is synonymous with the corporate entity that buyer represents. The buyer disclosed in Stewart does not represent both a separate networked entity and plurality of individual networked insurance consumers as claimed. The present invention requires a physical networking architecture that allows communication by both the networked entity and the individual consumers of that entity that is not disclosed in Stewart.

Furthermore, Claim 1 recites, in part, “whereby *each of said registered insurance consumers* can access data provided by the registered insurance business entity and associated with said RCID and can make *personal* selections on the data, the selections being stored in the administrative server.” The claimed invention required storage of each registered insurance consumer’s personal selections. Stewart does not teach or suggest storage of a plurality of personal selections from within each networked entity.

Peterson also does not disclose the either of the above-claimed features discussed with respect to Claim 1 by disclosing a system for registering insurance transactions of individual agents with a home office computer. Therefore, Stewart, whether individually or in combination with Peterson, does not teach or suggest the invention of Claim 1. Claims 2-15 depend from independent claim 1. Thus, it is respectfully submitted that dependent Claims 2-15 are also distinguishable over the applied references for at least the reasons described above with respect to Claim 1.

Claim 16 of the present invention recites in part, “...allowing the registered networked entity to selectively access the details of the group benefits plans provided by a registered insurance business entity and to *endorse the group benefits plans* wherein the administrative server will store the group benefits plans *endorsed* by the networked entity....” The Office Action refers to paragraphs 0026, 0027, and 0038 of Stewart as teaching this feature. However, Stewart does not disclose a network entity (or any equivalent third party) that

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serves the claimed endorsing function; nor does Stewart disclose a network structure that would allow a network entity to store plans endorsed by the entity. In fact, Stewart teaches away from the concept of having a network entity (or other third party) endorse a seller's product. Paragraph 0022 of Stewart discusses how special discounts are previously negotiated directly between the buyer and the seller and that special pricing is confidential between individual buyers and sellers. Peterson also does not disclose the claimed feature by disclosing a system for registering insurance transactions of individual agents with a home office computer. Therefore, Stewart, whether individually or in combination with Peterson, does not teach or suggest the invention of Claim 16.

Claims 17-30 depend from independent claim 16. Thus, it is respectfully submitted that dependent claims 17-30 are distinguishable over the applied references for at least the reasons described above with respect to Claim 16.

Claim 31 contains similar distinguishable features as those discussed above with respect to Claim 1. Thus, it is respectfully submitted that independent Claim 31, along with dependent claims 32-45 are also distinguishable over the applied references for at least the reasons described above with respect to Claim 1.

Claim 46 recites, in part, "a mechanism for indicating products and/or services that are endorsed by a networked entity; and ... wherein outputting the insurance business entity identifier allows details of the endorsed products and/or services to be outputted...." As noted above with respect to claim 16, Stewart teaches away from the concept of having a network entity endorse a seller's product, and Peterson also fails to disclose this feature. Thus, it is respectfully submitted that independent Claim 46, is distinguishable over the applied references. Claims 47-53 depend from independent claim 46. Thus, it is respectfully submitted that dependent Claims 47-53 are also distinguishable over the applied references for at least the reasons described above with respect to Claim 46.

Claim 54 recites a similar feature to claim 46, specifically, "a mechanism for indicating products and/or services that are endorsed by the networked entity; and ... wherein an outputting of the registered insurance consumer identifier allows the PC to receive details of endorsed products and/or services...." Thus, it is respectfully submitted that independent Claim 54, along with dependent claims 55-62 are also distinguishable over the applied references for at least the reasons described above with respect to Claim 46.

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In summary, Applicants respectfully request withdrawal of the rejection of claims 1-62 under 35 U.S.C. 103(a) based on Stewart in view of Peterson and submit that the application now stands in condition for allowance.

CONCLUSION

In view of the foregoing, Applicants submit that this application is in condition for allowance and such disposition is earnestly solicited. If the Examiner believes that the prosecution of this case might be advanced by discussing the application with Applicants' representative, in person, or over the telephone, we would welcome the opportunity to do so.

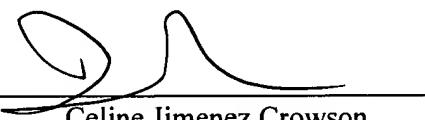
EXCEPT for fees payable under 37 CFR §1.18, the Commissioner is hereby authorized by this paper to charge any additional fees during the entire pendency of this application, including fees due under 37 CFR §1.16 and 1.17 which may be required, including any required extension of time fees, or credit, any overpayment to deposit account No. 50-1349. This paragraph is intended to be a constructive petition for extension of time in accordance with 37 CFR §1.136(a)(3).

If there are any fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-1349.

Respectfully submitted,

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